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Attorneys for the Defendant.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WILLIAM E. AVELLO,

Plaintiff,

v.

CAROLYN W. COLVIN, Acting Commissioner
 Of Social Security,

Defendant.

CIVIL NO. 2:13-cv-00504-JAD-GWF

**DEFENDANT'S UNOPPOSED
 MOTION TO EXTEND TIME TO
 RESPOND TO PLAINTIFF'S MOTION
 FOR REMAND
 (FIRST REQUEST)**

DEFENDANT CAROLYN W. COLVIN, Acting Commissioner of Social Security (Defendant) hereby moves this Honorable Court to grant her unopposed motion for a 60-day extension of time to file her response and/or cross-motion to Plaintiff William E. Avello's motion for reversal or remand. This is the first extension of time requested by Defendant. Defendant requires this extension of time because the volume of cases assigned to the Social Security Administration Office of General Counsel Assistant Regional Counsel responsible for this case is such that she will not be able to complete the brief in a timely fashion. Defendant will transfer this case to another attorney in the Social Security Administration's Office of General Counsel. However, the new attorney will need additional time to

adequately assess and address the arguments that Plaintiff has raised in his motion for summary judgment.

The current due date for Defendant's response/cross-motion is January 8, 2014. If this unopposed motion is granted, the new due date will be March 10, 2014.

The parties have further agreed that the Court's Scheduling Order shall be modified accordingly.

Dated: January 7, 2014.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney

/s/ Blaine T. Welsh
BLAINE T. WELSH
Assistant United States Attorney

OF COUNSEL:

DONNA L. CALVERT
Acting Regional Chief Counsel, Region IX
Social Security Administration

SHARON LAHEY
Assistant Regional Counsel
Social Security Administration, Region IX

IT IS SO ORDERED:

George Foley Jr.
UNITED STATES MAGISTRATE JUDGE

Dated: __ January 8, 2014

CERTIFICATE OF SERVICE

I, Blaine T. Welsh, certify that the following individuals were served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:

Heather Freeman
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Chicago IL, 60603
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Hal Taylor
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Dated this 7th day of January 2014.

/s/ Blaine T. Welsh
BLAINE T. WELSH
Assistant United States Attorney